

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen Williams
Magistrate Judge

Honorable Thomas Vanaskie
(Ret.),
Special Discovery Master

**NOTICE OF MOTION TO
SEAL PURSUANT TO L.
CIV.R. 5.3**

TO: Adam M. Slater, Esq.
Plaintiffs' Liaison Counsel
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Roseland, NJ 07068

PLEASE TAKE NOTICE that on September 7, 2021, or as soon thereafter as counsel may be heard, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), Princeton Pharmaceutical Inc. ("Princeton"), Huahai U.S. Inc. ("Huahai U.S."), and Solco Healthcare US, LLC ("Solco", and collectively with ZHP, Princeton, and Huahai U.S., "the ZHP Parties"), by and through their counsel in the above-captioned action, Duane Morris LLP, shall move before the Honorable Karen Williams, Magistrate Judge of the United States District Court for the

District of New Jersey, and the Honorable Thomas Vanaskie (Ret.), Special Discovery Master, for entry of an Order sealing a confidential document filed as Exhibit KK at ECF No. [1298](#), and the paragraph of ECF No. [1298](#) addressing Exhibit KK.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, the ZHP Parties shall rely on the accompanying Declaration of Kelly Bonner, dated August 5, 2021, the Declaration of Jun Du, dated August 5, 2021, attached as **Exhibit A** thereto, and an index identifying the documents the ZHP Parties seek to seal, attached as **Exhibit B** thereto.

PLEASE TAKE FURTHER NOTICE that, for the Court's convenience, a proposed form of Order, including Proposed Findings of Fact and Conclusions of Law pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys for the ZHP Parties request oral argument on this motion.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: August 5, 2021

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, Esq.
Lead Counsel and Liaison
Counsel for Defendants

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